

Exhibit B

BOIES, SCHILLER & FLEXNER LLP

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By E-mail & U.S. Mail

February 11, 2010

Michael B. Levin, Esq.
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, California 94304-1050

Re: *Oracle USA, Inc. and Oracle International Corp. v. Rimini Street, Inc. and Seth Ravin*, No. 2:10-cv-00106

Dear Mike,

Thank you for your letter of February 6, responding to my letter of January 28.

I appreciate your representation on behalf of your clients, Rimini Street and Seth Ravin, that “appropriate measures are in place to preserve potentially relevant materials.” However, that general statement does not provide all of the assurances sought in my January 28 letter. We should discuss in more detail the measures that each party has put in place and seek agreement on what is appropriate.

In your letter, you also asked that we confirm that Oracle “will adopt reasonable measures to identify and preserve all materials potentially relevant to any claims, defenses, or counterclaims anticipated to be litigated in this action.” We hereby confirm that Oracle will comply with its duties to preserve evidence, and accordingly will adopt reasonable measures to identify and preserve materials relevant to its claims, as well as materials relevant to any defenses that we presently anticipate Rimini Street and Mr. Ravin will assert. Of course, as your letter identifies neither defenses nor counterclaims, Oracle’s ability to identify and preserve documents that are “potentially relevant” to such issues is necessarily limited. I also note that you demand that Oracle preserve categories of documents that are so broad as to defy any reasonable application (e.g., “all materials relating to Oracle’s websites”).

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I hope that we can work together to agree on reasonable measures for preservation of evidence by both sides. To that end, I again invite you to discuss a stipulated protocol for both parties to preserve data and documents. I propose that we speak by phone on Wednesday, February 24, at 1:00 p.m. Please confirm that you will be available at that time, or suggest another.

Very truly yours,


Fred Norton

cc:

James C. Maroulis
Geoffrey M. Howard
Jonathan M. Jacobson